March 5, 2020

By ECF

Hon. Katherine Polk Failla U.S. District Court, S.D.N.Y. 40 Foley Square, Room 2103 New York, NY 10007

Re: Leibowitz et al. v. iFinex Inc., et al., 19-CV-09236-KPF

Dear Judge Failla,

The parties have met and conferred pursuant to the Court's guidance provided during the conference of February 27, 2020 and have agreed to a proposed schedule for the filing of a consolidated amended complaint and the briefing of any subsequent motion to dismiss. A Proposed Order containing that schedule is attached to this letter as Exhibit 1.

Respectfully submitted,

/s/ Caitlin Halligan

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Honorable Katherine Polk Failla March 5, 2020

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Encl: Exhibit 1